UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Whitney Williams,

Defendant.

Case: 2:25-cr-20366

Assigned To: DeClercq, Susan K. Referral Judge: Altman, Kimberly G.

Assign. Date: 5/20/2025

Description: IND USA V. WILLIAMS (MC)

Violation:

18 U.S.C. § 1591(a)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 1591(a)

Sex Trafficking of Children

Between on or about September 5, 2024 and on or about October 22, 2024, in the Eastern District of Michigan and elsewhere, the defendant, WHITNEY WILLIAMS, knowingly recruited, enticed, transported, provided, and obtained, in and affecting interstate and foreign commerce, Minor Victim One (MV-1), having had a reasonable opportunity to observe MV-1, and knowing and in reckless disregard of the fact that MV-1 had not attained the age of 18 years and that MV-1 would be caused to engage in a commercial sex act; all in violation of 18 U.S.C. § 1591(a).

FORFEITURE ALLEGATIONS

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 1594.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendant, WHITNEY WILLIAMS, shall forfeit to the United States of America (1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, and any property traceable to such property.

The property to be forfeited includes, but is not limited to, entry of a forfeiture money judgment for the total amount of proceeds obtained, directly or indirectly, as a result of the offense and for the total value of any property that was used to commit or to facilitate the commission of the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

THIS IS A TRUE BILL

s/Grand Jury Foreperson
Grand Jury Foreperson

JEROME F. GORGON JR. United States Attorney

s/Craig F. Wininger

Craig F. Wininger
Chief, Violent and Organized Crime Unit

s/Ranya Elzein

Ranya Elzein Assistant United States Attorney

Dated: May 20, 2025

Case 2:25-cr-20366-SKD-KGA ECF No. 14, PageID.29 Filed 05/20/25 Page 4 of 4 Assigned To: DeClercq, Susan K. **United States District Court** Criminal Case Cover Sheet Referral Judge: Altman, Kimberly G. **Eastern District of Michigan** Assign. Date: 5/20/2025 Description: IND USA V. WILLIAMS (MC) NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in an respects. **Companion Case Information Companion Case Number:** This may be a companion case based on LCrR $57.10(b)(4)^{1}$: **AUSA's Initials: R.E.** □Yes ☑No Case Title: USA v. Whitney Williams County where offense occurred: Wayne Offense Type: Felony Indictment -- prior complaint Case No. 25-MJ-30259 **Superseding Case Information Superseding to Case No:** Judge: Reason: Prior Complaint (if applicable) **Defendant Name** Charges Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case May 20, 2025

Ranya Elzein

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.